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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, *et*  
*al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF DWIGHT DIVELY  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY RELIEF**

**DECLARATION OF DWIGHT DIVELY**

I, DWIGHT DIVELY, declare:

1. I am over the age of 18 years, am competent to testify as to the matters in this Declaration, and make it based on personal knowledge in addition to my review of relevant business records.

2. I am the Chief Operating Officer (“COO”) and Director of Performance, Strategy and Budget (“PSB”) for the Martin Luther King, Jr. County (“King County”). I have been in this position since 2010. I am also a member of Executive Shannon Braddock’s Senior Leadership Team. I am also an affiliate assistant professor at the University of Washington, Evans School of Public Policy and Governance. Before joining King County, I was the City of Seattle’s Director of Finance for 15 years.

3. As King County’s COO, I am charged with overseeing and understanding King County operations and its various books of business. I am responsible for developing and monitoring the biennial King County budget, implementing the King County Strategic Plan, identifying and tracking performance measures, developing and implementing the King County Comprehensive Plan, overseeing business planning, and managing many of the grants received by King County. I oversee a wide range of activities, including project analysis, financial forecasting, program evaluation, demographic analysis, and policy development. I also track the budgets of individual King County departments and the public services they provide.

**King County**

4. Located in the Pacific Northwest, at 2,307 square miles, King County has almost twice the land area of the State of Rhode Island. With a population of approximately 2.3 million people, King County is the 12<sup>th</sup> most populous county in the United States. King County contains over 800,000 acres of forests, more than 60 named lakes, over 3,000 miles of rivers and streams, and is bounded by Puget Sound to the west. While the eastern portion of King County is dominated by the Cascade Mountain Range, King County’s 39 cities, the largest of which is the City of Seattle, are primarily located in western lowlands. King County owns over 200 parks, 175 miles of regional trains, and 215 miles of backcountry trails. It is home to some of Washington’s most well-known businesses,



1 including Microsoft, Amazon, Starbucks, Costco and Boeing Commercial Aircraft, alongside many  
2 higher education institutions such as the University of Washington.

3         5. King County government provides a full range of local and regional, urban and rural  
4 services across the County's diverse geography, managing nearly 17,700 employees and an overall  
5 approximately \$10.2 billion budget. Among other things, King County operates a regional wastewater  
6 service, one of the largest bus transit systems in the county, a water-based transit service, and an  
7 international airport. The King County sheriff provides direct law enforcement services for  
8 unincorporated King County and 12 contract cities, as well as county-wide services mandated by state  
9 law. King County supports all felony prosecution and adjudication of state crimes committed within  
10 the County's boundaries through provision of the King County Prosecuting Attorney's Office, the  
11 Department of Public Defense, and both Superior and District Court services. It runs extensive public  
12 health, social health, and mental health services and supports other social service infrastructure for  
13 homeless, migrant, and refugee populations. King County is also responsible for overseeing King  
14 County voting in local, state and federal elections and funding emergency management services.

15         6. As a public entity, King County is not a profit-making enterprise, and the costs of  
16 providing these public services always exceed King County's non-tax-related revenues. King County  
17 secures additional state and federal funding support through several types of arrangements. King  
18 County's 2025 general fund and enterprise operating budgets include more than \$200 million in  
19 federal revenue. Some federal funding is received indirectly through the State of Washington.

20         7. King County also enhances its efficiency, expertise, and capacity by working closely  
21 with various federal agencies in performing mission critical work and in turn helping the federal  
22 government meet its legal and constitutional objectives under our federalist system.

23         8. King County's capital budget is supported by federal revenue forecasted for several  
24 years into the future. The amount of federal capital funds either awarded to King County for 2025 or  
25 included in the budget for 2025 based on congressionally required formula funding is approximately  
26 \$500 million. Capital projects require dependable funding sources over the lengthy timelines required  
27 for design through full project build-out and always require King County to make extensive and  
28 expensive third-party contract commitments.

9. An important consideration for both operating and capital expenditures funded by the federal government is the timeliness of federal disbursements. King County fulfills its mission critical functions both through the efforts of its employees and through the services of third-party contractors. King County does not have the ability – particularly in a time of general fund shortfalls and revenue challenges – to float federal debts or untimely payments that are owed to King County. Timely federal reimbursement necessarily depends on the availability of federal employees to accept reimbursement requests, process those requests, approve them, and issue payments. Lapses in federal payment timelines increase costs for King County’s operations and can have a substantial deleterious impact on third parties that work with King County, including nonprofit organizations who already struggle financially to stretch each dollar in serving the public.

**General Direct and Indirect Harms**

**Arising from the Dismantling of the Federal Government**

10. I am informed, and on that basis, believe, that over 120,000 federal employees have been fired or laid off by the federal government in 2025 to date.

11. The widely-reported summary termination of a vast number of federal employees from various agencies over the past couple of months, as directed by the United States Office of Management and Budget (“OMB”), Office of Personnel Management (“OPM”), and Department of Government Efficiency (“DOGE”), has had and continues to have immediate, negative, and increasingly drastic impacts to King County’s operations, planning, and delivery of services to the 2.3 million people of King County. Continued reductions in the federal workforce, including what appear to be draconian cuts to EPA, HUD, NOAA, and AmeriCorps offices, have exacerbated these negative impacts. King County staff have been unable to reach federal employees who are responsible for managing awarded grants that provide critical funding for current projects and operations. Meetings and national briefing calls staffed by federal employees to disseminate information critical to service delivery, crisis response, and continuous improvement have been canceled. Emails and calls have gone unanswered. Federal employee team members are disappearing from work teams, requiring King County to pause delivery of services to communities.

12. As one example, it has been reported that the U.S. Department of Health & Human



Services (“HHS”) is eliminating and consolidating functions, including post-disaster U.S. Centers for Disease Control and Prevention (“CDC”) teams. At the same time, the federal government is cutting or proposing to cut funding to states that, coupled with Washington’s current budgetary crisis, will likely see the elimination of a large number of Washington State Department of Health (“WA DOH”) positions. Further compounding this situation is King County’s own budgetary shortfall (separate from the unlawful delays and terminations of federal grants made directly to King County and passed through the State of Washington) that will potentially reduce the number of personnel with, for example, the Department of Public Health for Seattle and King County (“PHSKC”). The result will be that for critical issues like disaster preparedness and disease outbreaks, there will be fewer professionals available to prepare, investigate, and respond.

13. Another major preparation and coordination challenge involving multiple federal agencies is the FIFA World Cup that will take place in North America in 2026. The United States has a majority of the venues and games; Lumen Field in Seattle will have six games in June and July 2026, including two in the “knockout” stage. Many different federal agencies touch this event, which is slated to be the largest sporting event internationally to date. There will be millions of visitors coming to the United States; in this region, approximately 750,000 unique individuals are expected to travel to the area for the event(s). Reductions in Force (“RIF”) in the federal workforce, downsizing, and eliminations of entire programs and offices may result in a lower level of readiness for the federal government, which has a responsibility to coordinate and ensure the security of events such as the FIFA World Cup across the entire country through agencies including DHS, the U.S. Department of State (“State”), and the U.S. Department of Justice (“DOJ”).

#### **Harms Arising from the Downsizing of Federal Agencies**

14. The following are select examples of impacts that the federal government’s RIFs have had, will have, or may have, on King County operations, including what appear to be likely future impacts from additional threatened terminations of federal employees:

#### **Harms Related to Downsizing of U.S. Department of Agriculture**

15. King County owns and operates King County International Airport-Boeing Field (KCIA), located four miles south of downtown Seattle. KCIA is one of the busiest non-hub airports

1 in the nation, serving small commercial passenger airlines, cargo carriers, private pilots, corporate jets,  
2 helicopters, and military aircraft.

3 16. A large-scale RIF at the U.S. Department of Agriculture (“USDA”) may cause King  
4 County to experience, among other things, increased hazards to air traffic at KCIA. The USDA  
5 provides a wildlife biologist to manage prey animals that attract predatory birds, the presence of which  
6 create a hazard to air traffic. Should the USDA suffer sudden and unexpected staffing reductions,  
7 KCIA could be temporarily left without a biologist to manage wildlife conditions that could increase  
8 the risk of bird strikes to aircraft. Alternatively, KCIA would incur increased costs not currently  
9 accounted for in King County’s budget by way of having to manage wildlife conditions without USDA  
10 support.

11 17. King County is also aware of USDA’s plan to reorganize and cut nearly \$2 billion for  
12 food programs. Specifically, King County is aware that the USDA has already cut \$500 million from  
13 the Local Food Purchase Assistance program (“LFPA”), is in the process of cutting \$500 million from  
14 The Emergency Food Assistance Program (“TEFAP”), and is in the process of cutting an amount in  
15 excess of \$700 million from the Local Food for Schools Program (“LFS”). These nationwide cuts  
16 will have a pronounced effect in King County, where local food banks and meal providers are already  
17 struggling to meet escalating demand. These three programs are only the most visible examples -  
18 there are numerous other smaller cuts and canceled contracts that are disrupting the ability of farmers  
19 and community partners to grow and distribute food effectively in our communities. Should the USDA  
20 suffer a large-scale RIF in association with these significant costs to funding, programmatic support  
21 and staff expertise will be lost, corresponding program reach will be reduced, and vulnerable residents  
22 of King County will no longer be receiving the services they require. Alternatively, King County will  
23 incur increased cost to make up for the loss in federal support beyond that included in the current  
24 budget.

25 **Harms Related to Downsizing of AmeriCorps**

26 18. PHSKC runs a Public Health Reserve Corps (“PHRC”) program that works with a  
27 Preparedness AmeriCorps member to expand capacity to deliver services to vulnerable residents of  
28 King County. This week’s loss of this AmeriCorps team member means that King County likely will



1 need to cancel several scheduled volunteer events including care clinics with homeless service  
2 providers and naloxone distribution and trainings.

3 19. The King County Executive Climate Office (“ECO”) currently has a fellow under the  
4 CivicSpark AmeriCorps program who is helping to support the King County – Cities Climate  
5 Collaboration and the development of King County’s Strategic Climate Action Plan. A previous  
6 fellow also helped with King County - Cities Climate Collaboration as well as our Wildfire Mitigation  
7 Strategy implementation and partner convening. Other King County agencies, including the Office of  
8 Emergency Management (“OEM”), also have AmeriCorps members through the Washington Service  
9 Corps.

10 20. Loss of AmeriCorps partnerships through the PHRC, CivicSpark, and other programs  
11 would lead to increased cost to King County by needing to fund new positions that were previously  
12 subsidized through AmeriCorps, and may lead to a loss of building local workforce capacity and  
13 cultivating career opportunities for future civic leaders in the region.

14 **Harms Related to Downsizing of U.S. Department of Commerce**

15 21. King County employees depend on working relationships with U.S. Department of  
16 Commerce (“Commerce”) employees in the National Marine Fisheries Service (“Fisheries”) and  
17 National Weather Service (“NWS”) within Commerce’s National Oceanic and Atmospheric  
18 Administration (“NOAA”) for permitting capital projects, preparing and responding to hazardous  
19 weather, and managing and protecting local marine wildlife.

20 22. A large-scale RIF at Commerce would cause King County to experience, among other  
21 things:

- 22 a. Delays and associated increased costs in commencing time-sensitive capital projects  
23 due to delays in consultations and permit review and issuance relating to, among other  
24 things, Fisheries’ Endangered Species Act (“ESA”) and Essential Fish Habitat (“EFH”) review.
- 25 b. Loss of critical staffing for interagency emergency response teams historically  
26 comprised of King County and NWS team members who coordinate to conduct  
27 outreach to communities and provide education before major weather events like the  
28

November 2024 “bomb cyclone” windstorm that resulted in several fatalities.

- c. Loss of critical factual data that is otherwise provided to King County’s Emergency Management staff by NWS on weekly regional coordination calls that provide essential briefings on King County-specific weather information, including hazardous weather, and protects responder lives and safety in addition to the lives and safety of King County residents and visitors.
- d. Loss of critical partnership with Fisheries in developing and implementing Puget Sound Salmon Recovery Plans that are essential to management and protection of several species of salmon within King County and the region’s overall biodiversity.
- e. Loss of NOAA staff expertise and collaboration on scientific studies, impacting King County’s ability to implement and monitor environmental initiatives effectively. Of note, numerous King County departments have reported that NOAA has effectively gone “dark” by way of a recent complete cessation in communications.

23. In light of the above concerns, implementation of Commerce’s RIF may cause King County to (1) incur significant delays in its ability to timely complete projects held up by lack of staffing to review and process consultations and permits, (2) be unable to appropriately prepare for and respond to hazardous weather, and/or (3) incur additional costs relating to weather preparedness and emergency response to hazardous weather.

#### **Harms Related to Downsizing of U.S. Department of Defense**

24. A large-scale RIF at the U.S. Department of Defense (“DoD”) would result in King County experiencing, among other things, delays in the review and issuance of permits that, in turn, could result in increased capital project (construction) costs as well as an inability of King County to support its residents with critical infrastructure and environmental improvements.

25. King County often engages with DoD’s U.S. Army Corp of Engineers (“USACE”) to secure permits required for work performed on any navigable body of water designated as water of the United States. USACE permits are also required for work in any wetlands, whether contiguous or not, to such bodies of water.



26. As one example, King County's Department of Natural Resources and Parks' ("DNRP") Wastewater Treatment Division ("WTD") has a number of current permits as well as permit applications lodged with USACE for in-water construction work as part of critical infrastructure improvements to King County's aging wastewater treatment conveyance systems. Robust communication with USACE employees is critical for the projects to begin and continue. If permit approvals are not provided on time, select construction work may need to be moved to 2026 due to "fish windows" (approved work windows for fish protection in the area). Moving construction work one year, in turn, will result in significantly increased costs of construction due to inflation, and will also delay these critical improvements to the wastewater system in detriment to the residents of King County.

27. WTD also relies on weekly, if not daily, support from a USACE inspector – alongside an EPA inspector – for in-water work to continue the critical Lower Duwamish Waterway ("LDW") Superfund Cleanup work that is currently underway. If USACE staffing is cut that includes this inspector, progress on the LDW Superfund Cleanup may stall, or the work, if it proceeds, may risk proceeding in a noncompliant matter.

28. King County further engages with USACE in relation to Section 106 of the National Historic Preservation Act of 1966 (NHPA), which requires federal agencies to consider the effects of projects on historic properties. A large-scale RIF may result in delays in this requisite review, which would also delay construction projects throughout King County and bring the potential for increased costs due to inflation.

#### **Harms Related to Downsizing of U.S. Department of Energy**

29. A large-scale RIF at the U.S. Department of Energy ("DOE") would result in King County experiencing, among other things, delays in the implementation of critical work funded by DOE grants.

30. As one example, the King County Executive Climate Office ("ECO") is currently implementing an Energy Efficiency and Conservation Block Grant ("EECBG") under DOE's EECBG Program. This grant is important to King County as it will allow it to continue its efforts to reduce fossil fuel emissions and energy use, and improve energy efficiency in various sectors. On April 24,

2025, ECO was advised that the technical project officer for that particular grant was leaving DOE, that ECO may reach out to various email addresses unattached to specific people such as eecbg@hq.doe.gov for issues and questions, and that a new technical project officer has not yet been assigned to the grant.

### Harms Related to Downsizing of Environmental Protection Agency

31. A large-scale RIF at the U.S. Environmental Protection Agency (“EPA”) would result in King County experiencing, among other things:

a. Delays and uncertainty, including risk of reduced federal oversight and support in implementing and maintaining existing grants, including the \$50 million Climate Pollution Reduction Grant (“CPRG”) awarded to the King County Executive Climate Office (“ECO”), affecting programs like embodied carbon initiatives and reliance on Energy Star tools for building decarbonization. Delays to the implementation of this CPRG grant have already been felt, initially due to the “freeze” on federal funds addressed in the matter *State of New York, et al. v. Trump et al.* (25-cv-00039-JJM-PAS), then due to an internal EPA “communications hold” that ECO learned about from EPA employees who are, as of the past two months, no longer employed by EPA.

i. As part of King County’s obligated EPA CPRG award, there is a component of the grant focused on embodied carbon. King County is informed and believes that EPA has canceled other grants that were to be focused on embodied carbon and reassigned much of their embodied carbon staff. Without an embodied carbon team at EPA, and without the data quality, disclosure, and thresholds guidance that EPA and EPA grantees were developing, King County is concerned there may be a negative impact on its ability to fully implement the embodied carbon portion of the CPRG award. Additionally, there may be embodied carbon tools or data sets King County is now unable to access (from EPA, GSA, and other federal agencies).

ii. Also as part of the CPRG award, King County’s building decarbonization programs rely on EPA’s Energy Star programs, especially Energy Star Portfolio



1 Manager, which is a free tool used to collect building-level energy use data.  
2 Energy Star also has programs that set standards for appliances as well as  
3 building energy use rating systems. If these programs end or are understaffed  
4 such that they do not function well, there will be negative impacts on King  
5 County's ability to meet its building decarbonization targets, as well as measure  
6 progress toward them. Relatedly, as King County ramps up its flourishing heat  
7 pump and solar programs, it is concerned that cuts in staff may have impacts  
8 related to ensuring supply chains for these products.

9 b. Beyond the above-referenced CPRG award, many King County agencies and  
10 departments including ECO, WTD, OEM, PHSKC, and others, have existing grants  
11 with EPA. For these existing grants, EPA project officers are required to review and  
12 approve recipient reports and submittals in order to maintain existing awards in good  
13 standing. EPA project officers are also required to review and approve expenditures  
14 and programmatic changes requiring prior federal approval, as well as any requested  
15 amendments, supplements, or no-cost extensions of existing awards. The review and  
16 approval process provides important independent affirmation of King County  
17 compliance with federal standards applicable nationwide.

18 i. For example, King County's WTD funds critical projects through EPA's Water  
19 Infrastructure Finance and Innovation Act ("WIFIA") loan program, which  
20 aims to accelerate investment in the nation's water infrastructure by providing  
21 long-term, low-cost financing to enable upgrades to water and wastewater  
22 infrastructure of regional or national importance. Robust communication with  
23 EPA employees is a critical component of advancing these WIFIA-funded  
24 projects.

25 c. Potential loss of EPA staff inspectors, as well as staff expertise and resources crucial  
26 for data quality and program support, will impact King County's ability to implement  
27 and monitor environmental initiatives effectively.

28 i. As described above, WTD relies on weekly, if not daily, support from an EPA

1 inspector – alongside an USACE inspector – for in-water work to continue on  
2 the critical LDW Superfund Cleanup work that is currently underway. If EPA  
3 staffing is cut that includes this inspector, progress on the LDW Superfund  
4 Cleanup may stall, or the work, if it proceeds, may risk proceeding in a  
5 noncompliant matter.

6 d. Diminished collaboration and data sharing with EPA staff critical for climate and  
7 environmental assessments could hinder accurate greenhouse gas (“GHG”) inventories  
8 and both mitigation and adaptation planning. Many climate issues like clean air or  
9 clean water do not know government jurisdictional boundaries, and in some cases,  
10 federal entities such as EPA are needed to convene two or more parties to develop  
11 solutions for some of the regional challenges that arise. Additionally, GHG inventories  
12 and estimates of mitigation measures are very dependent and reliant on federal data  
13 sources to provide county or state level data that is used as the basis for inventory and  
14 mitigation measure analysis. Accuracy and confidence in estimates depend upon  
15 regularly updated data using standardized and consistent data collection and reporting  
16 methods.

17 e. The removal and associated loss to the public of mapping tools providing data on  
18 regions where there are concentrations of pollution burden and socially vulnerable  
19 populations creates challenges to our ability to determine where the deployment of  
20 mitigation strategies is most effective and impactful. These tools include the EPA EJ  
21 SCREEN (no longer available), the Climate & Economic Justice mapping tool (no  
22 longer available), and the DOE Energy Justice mapping tool (no longer available).

23 f. Compromised hazardous materials response and cleanup efforts due to reduced EPA  
24 staffing and contractor support may affect health and environmental outcomes in the  
25 region.

26 32. These potential impacts would pose significant challenges to King County’s  
27 environmental management and climate mitigation strategies, potentially hindering progress and  
28 effectiveness in addressing local and regional environmental issues, the direct and indirect impacts of



1 which will be felt by residents in the near and long term.

2 **Harms Related to Downsizing of U.S. Department of Health & Human Services**

3 33. A large-scale RIF at the U.S. Department of Health & Human Services (“HHS”) would  
4 result in King County experiencing, among other things:

5 a. Disruptions in grant management communications with U.S. Centers for Disease  
6 Control and Prevention (“CDC”) staff, resulting in delays to critical public health  
7 programs like the REACH (Racial and Ethnic Approaches to Community Health)  
8 grant, and forcing King County to divert other limited funds as an unsustainable  
9 stopgap.

10 i. PHSKC staff have not been able to reach the grant management specialist  
11 responsible for approving contract amendments for the REACH grant despite  
12 emailing, calling, leaving voicemails, calling the specialist’s supervisor, and  
13 sending messages through the Grant Solutions platform. REACH is a CDC-  
14 funded program that uses proven strategies to help improve health, prevent  
15 chronic diseases, and reduce racial and ethnic health disparities and gaps. Due  
16 to this lack of communication, King County’s amendment request to add a new  
17 contractor has remained unanswered since March 2025. To mitigate as a short-  
18 term solution, King County is having to leverage different funding to secure the  
19 contract. This stop-gap measure is not sustainable as it will compromise King  
20 County’s ability to deliver other important public health services.

21 ii. PHSKC’s Community Health Worker Unit experienced a similar cessation in  
22 communication with their CDC Project Officer, receiving only an email  
23 response stating, “Your message couldn’t be delivered to the recipient because  
24 you don’t have permission to send to it.” This resulted in confusion and concern  
25 about potential interruptions in grant-related work.

26 b. Loss of essential personnel, including the firing of a Public Health Associate Program  
27 (“PHAP”) participant who worked in King County’s Sexual Health Clinic and saw Pre-  
28 Exposure Prophylaxis (“PrEP”) patients. King County’s Sexual Health Clinic provides

PrEP for HIV to the greatest number of people of any clinic in the state – more than 1,000 patients. PrEP is a highly effective strategy to prevent HIV among people at high risk of contracting the disease. Cutting this position reduces capacity to deliver an effective prevention strategy, and this could in turn increase the risk of HIV transmission.

- c. Cancellation of regular national public health coordination calls, impeding the dissemination of vital information across federal, state, and local public health officials and program staff needed for disease detection, response, and ongoing public health program management.
- d. Significant risks to the administration of Medicaid services, including \$310 million in state and federal funding for 50,000 individuals, which could threaten King County's ability to deliver critical healthcare services to vulnerable populations and impose severe financial burdens.

34. As shown through the examples above, a large-scale RIF at HHS could seriously compromise King County's public health infrastructure, healthcare delivery, and the health and wellbeing of its most vulnerable residents.

#### **Harms Related to Downsizing of U.S. Department of Homeland Security**

35. A large-scale RIF at the U.S. Department of Homeland Security ("DHS") could severely impair King County's airport (as defined herein, "KCIA") operations, emergency management, environmental restoration projects, and community resilience, while increasing financial burdens and risk across multiple critical services. Loss of federal employee partners would result in King County experiencing, among other things:

- a. Delays in U.S. Customs and Border Protection ("CBP") agency services at KCIA, causing international flights to sit idle on the ramp until officers arrive to process arrivals, disrupting passenger flow and airport operations. Specifically, KCIA is a gateway for international arrivals necessitating a presence by CBP officers. Federal law requires all international arrival flights to park on the main terminal ramp and await a CBP officer to board the aircraft and approve the entry of passengers prior to entry



1 into the United States. When CBP suffers staff shortages, aircraft must sit on the ramp  
2 and await officers to arrive from approximately 10 miles away to perform the  
3 inspection before the passengers can disembark.

4 b. Potential reductions in Transportation Security Administration (“TSA”) staffing,  
5 jeopardizing KCIA’s ability to conduct required passenger screenings under the DCA  
6 Standard Security Program for flights into Ronald Reagan Washington National  
7 Airport. Specifically, KCIA administers Transportation Security Administration  
8 passenger screening procedures under the DCA Standard Security Program  
9 (“DCASSP”). The airport is one of only two airports located in the State of Washington  
10 authorized to screen passengers for flights into Ronald Reagan Washington National  
11 Airport (“DCA”) near Washington DC. Reductions in TSA staff would potentially  
12 impact the airport’s ability to provide screening services under the DCASSP.

13 c. Diminished Federal Emergency Management Agency (“FEMA”) capacity, reducing  
14 King County’s ability to conduct community emergency preparedness outreach,  
15 respond efficiently to infrastructure damage from disasters, and receive timely  
16 reimbursements for disaster recovery work, including road repairs and flood facility  
17 restoration.

18 d. Loss of FEMA-funded staff at King County’s Office of Emergency Management  
19 (“OEM”), threatening the implementation of critical public safety strategies, including  
20 wildfire risk reduction and extreme heat mitigation plans. For example, FEMA-funded  
21 OEM staff are currently leading the development of a Community Wildfire Protection  
22 Plan called for in Action 4 of the Wildfire Risk Reduction Strategy. Additional impacts  
23 could also occur depending on which OEM staff funded by FEMA are laid off.

24 e. Significant permitting delays for local projects requiring FEMA review or approvals,  
25 such as stream relocations tied to floodplain management, risking costly project  
26 postponements and increased construction costs.

27 i. For example, within King County’s Department of Local Services (“DLS”),  
28 their permitting agency often sees local applications filed either after a federal

1 agency has issued a permit to the applicant, or while an application for a federal  
2 permit is under review. The majority of the time, these permits are issued by  
3 FEMA. If there is an RIF within FEMA, the DLS applicants may see a delay  
4 in review and/or issuance of permits that are a prerequisite to DLS issuing a  
5 subsequent and related permit to authorize a project to proceed. Currently, and  
6 as one example, there is a project for which the City of Redmond is seeking  
7 approval from DLS that will require the relocation of a stream. This stream  
8 relocation requires a letter of map amendment from FEMA, the application for  
9 which was provided to FEMA some time ago, with no response to date and  
10 reflecting a serious delay. If the letter of map amendment is not provided this  
11 spring, the project will be delayed until spring 2026, and the City of Redmond  
12 has advised their project (construction) costs may increase by approximately \$1  
13 million due to inflation and other considerations. The City of Redmond has  
14 asked DLS to exempt the requirement of receiving this map amendment and  
15 deal with FEMA later, but that is a risk DLS is unable to take. If DLS were to  
16 approve the project without the map amendment, and FEMA subsequently  
17 declined to issue the map amendment, the time and costs involved in reversing  
18 the project's construction would be significant.

19 f. Potential negative impacts on King County's flood program and insurance ratings if  
20 FEMA staffing reductions lead to noncompliance findings during audits, creating  
21 cascading financial and operational risks over time.

22 g. Delays in Section 106 reviews under the NHPA for federally connected projects,  
23 potentially stalling key capital projects aimed at habitat restoration and flood hazard  
24 reduction.

25 36. As shown through the examples above, a large-scale RIF at DHS could result in, among  
26 other things, noticeable delays at KCIA for airplane passengers, delays and increased costs for local  
27 construction projects, and delays and/or the inability to conduct effective and comprehensive  
28 community emergency preparedness outreach, respond efficiently to infrastructure damage from



1 disasters, and receive timely reimbursements for disaster recovery work, including road repairs and  
 2 flood facility restoration.

3 **Harms Related to Downsizing of U.S. Department of Housing and Urban Development**

4 37. King County is advised of the announced closure of the U.S. Department of Housing  
 5 and Urban Development's ("HUD") Region 10 office in Seattle - serving Alaska, Idaho, Oregon, and  
 6 Washington. King County is advised that this closure will impact approximately 150 employees. The  
 7 closest HUD office would be in San Francisco, which is more than 650 miles from Portland and 850  
 8 miles from Seattle.

9 38. A large-scale RIF at the HUD could deeply undermine King County's housing stability,  
 10 affordable housing development, veteran services, disaster recovery capacity, and the health and safety  
 11 of vulnerable communities. It would result in King County experiencing, among other things:

- 12 a. Delays in the execution of federal contracts for approximately \$47 million in  
 13 Continuum of Care ("CoC"), Community Development Block Grant ("CDBG"),  
 14 HOME Investment Partnerships ("HOME"), and Emergency Solutions Grant ("ESG")  
 15 funds, forcing King County to temporarily cover costs and risking contract  
 16 cancellations with service providers if delays persist.
- 17 b. Risk of widespread eviction of upwards of 2,144 households due to discontinuation of  
 18 \$20 million in CoC rent payments and the shutdown of supportive services for  
 19 permanent supportive housing, leading to unsafe living environments and staff layoffs.
- 20 c. Inability to support operations and services for permanent supportive housing buildings  
 21 resulting in provider staff layoffs and unsafe environments for residents and staff  
 22 (\$17M in CoC funds).
- 23 d. Pausing of critical community capital projects, including health and safety  
 24 improvements at community centers, senior center elevator replacements, affordable  
 25 housing developments, and housing repair programs.
- 26 e. Project delays and significant additional costs for affordable housing development if  
 27 HUD staff reductions impede issuance of required National Environmental Policy Act  
 28 ("NEPA") clearances, including the Authority to Use Grant Funds ("AUGF"). Without

1 the AUGF, King County cannot release funds awarded to affordable housing  
2 development. Decreased HUD staff capacity could cost housing developers hundreds  
3 of thousands of dollars in project delays.

4 f. Severe impacts to King County's Collaborative Case Management ("CCM") program  
5 for veterans, reducing coordination with HUD-VASH programs and limiting King  
6 County's ability to connect veterans to vital housing and supportive services.

7 i. In 2021, King County launched CCM, a first-of-its-kind program blending  
8 Housing and Urban Development – Veterans Affairs Supportive Housing  
9 ("HUD-VASH") rental assistance vouchers with local housing navigation and  
10 supportive services offered by the King County Veterans Program ("KCVP").  
11 Earning a National Association of Counties ("NACo") 2023 Achievement  
12 Award recognizing innovative county government programs, CCM depends on  
13 close collaboration with federal employees implementing the HUD-VASH  
14 program. On January 29, 2025, King County staff learned that the U.S.  
15 Department of Veterans Affairs ("VA") had received a directive from the  
16 federal administration prohibiting communication and coordination with any  
17 non-federal organization. Subsequent updates indicated CA referrals to CCM  
18 had resumed, but case conferencing and coordination of initial triage of veterans  
19 trying to enter the program remains limited. King County's ability to serve  
20 veterans has diminished significantly with the RIF.

21 g. Slowed disaster recovery and community rebuilding efforts if HUD's Community  
22 Development Block Grant Disaster Recovery ("CDBG-DR") programs are strained,  
23 potentially shifting the financial and operational burden onto King County, which lacks  
24 sufficient resources to fill these gaps.

25 h. The loss of federal employees at HUD may negatively impact King County's ability to  
26 draw down above-referenced committed federal funds, access portals, and  
27 communicate with staff. Specifically, King County understands HUD is down to only  
28 one environmental officer for the region which could slow environmental reviews.



King County is also advised that DOGE is considering cutting off the online environmental review system and reverting to paper reviews, which would be a large burden on staff.

- i. Cuts to HUD staffing will likely strain programs like Community Development Block Grants for disaster recovery, potentially slowing down housing and community rebuilding efforts. These reductions could shift the burden to state and local governments. King County currently lacks the resources that would be needed to fill the potential gap.

#### **Harms Related to Downsizing of U.S. Department of the Interior**

39. A large-scale RIF at the U.S. Department of the Interior (“DOI”) would significantly slow King County’s ability to complete infrastructure, transportation, and environmental projects, increase costs, and reduce the effectiveness of efforts to protect endangered species and historic resources. It would result in King County experiencing, among other things:

- a. Increased uncertainty and project delays due to extended consultation and permit review and issuance in ESA and EFH reviews conducted by U.S. Fish and Wildlife Service (“USFWS”) along with NOAA Fisheries, which oversee species like Chinook Salmon and Bull Trout, affecting King County’s ability to move forward with critical infrastructure and environmental projects.
- b. Risks to the productivity of two recently hired King County staff who report to DOI, and who are dedicated to expediting ESA reviews, as the federal supervisors they report to could be subject to layoffs, thereby undermining King County’s investment in these positions.
- c. Delays in compliance with Section 106 of NHPA, which requires consultation with the Bureau of Indian Affairs and other DOI agencies on the impacts of federally funded or permitted projects on historic properties, potentially stalling project approvals.

#### **Harms Related to Downsizing of U.S. Department of Transportation**

40. A large-scale RIF at the U.S. Department of Transportation (“DOT”) would slow critical aviation and transportation projects, increase safety risks for air travelers and road users, and

1 delay important infrastructure work needed to support King County's growing transportation  
2 demands. It would result in King County experiencing, among other things, the following:

- 3 a. Significant delays in communication and critical approvals from the Federal Aviation  
4 Administration's ("FAA") Airport District Office ("ADO"), affecting KCIA airport  
5 planning, grant administration, environmental reviews, safety certifications, and  
6 airspace hazard analyses, which could threaten airport safety and financial  
7 sustainability. Specifically, KCIA depends on communication with key individuals at  
8 ADO for planning and program management. KCIA administers various projects  
9 funded by the Airport Improvement Program ("AIP") which include federal grant  
10 administration and reimbursement for planning and project costs, preparation and  
11 ongoing approval of the Airport Layout Plan, preparation of environmental  
12 documentation under NEPA, airport certification and safety approvals pursuant to 14  
13 C.F.R. Part 139, and airspace hazard analysis pursuant to 14 C.F.R. Part 77 for on-  
14 airport and airport-adjacent construction projects, among other activities mandated by  
15 the FAA.
- 16 b. The recent layoff of FAA probationary employees, which has subsequently been  
17 reversed, caused a noticeable delay in obtaining timely responses from the ADO.  
18 Further staff reductions at the FAA would cause delays in critical approvals and  
19 guidance that could adversely impact airport safety and financial sustainability.
- 20 c. Increased safety risks if FAA air traffic controller staffing shortages occur.  
21 Specifically, KCIA maintains an air traffic control ("ATC") tower staffed by FAA air  
22 traffic controllers on a 24 hour per day, seven day per week basis. Should staffing  
23 shortages occur among the air traffic controllers, leaving the airport tower without staff,  
24 the airport would revert to a condition known as "ATC Zero" where pilots would need  
25 to operate in and out of KCIA on their own without ATC guidance, increasing the risk  
26 of accidents due to airspace congestion, ground hazards and adverse weather  
27 conditions. KCIA currently experiences over 180,000 flight operations per year  
28 including corporate jet traffic, large cargo jet aircraft operated by the United Parcel



1 Service and delivery and test flights of aircraft ranging from the 737MAX to the 777X  
 2 manufactured and operated by The Boeing Company.

- 3 d. Disruptions to King County's traffic safety initiatives, as the DOT's leadership in  
 4 Target Zero strategies and Safe Streets for All ("SS4A") grant support may be reduced,  
 5 potentially stalling progress toward reducing traffic fatalities and improving safety for  
 6 all road users.
- 7 e. Delays in compliance with Section 106 of NHPA for transportation projects requiring  
 8 federal review through the Federal Highway Administration ("FHWA"), potentially  
 9 slowing project approvals.
- 10 f. Impacts to King County's Road Services Division transportation projects, which  
 11 depend on coordination between the Washington State Department of Transportation  
 12 ("WSDOT") and federal agencies like FHWA to maintain compliance with federal  
 13 regulations. Staffing reductions could cause further permitting and project execution  
 14 delays.

15 **Harms Related to Downsizing of U.S. Department of Veterans Affairs**

16 41. King County legislation authorizing the Veterans, Seniors, and Human Services Levy  
 17 ("VSHSL"), and its corresponding implementation plan, identifies veterans, military service members,  
 18 and their families as a priority population for the levy and, by extension, for PHSKC's Adult Services  
 19 Division. In PHSKC's efforts to serve this population, it relies heavily on the availability of services  
 20 provided by federal partners, particularly the U.S. Department of Veterans Affairs ("VA").

21 42. In relation to PHSKC's services through its Adult Services Division, King County is  
 22 aware of the following impacts already felt to date by King County residents following RIF as well as  
 23 cuts to funding arising from or related to the VA:

- 24 a. Many VA contracts have been cut, particularly in communications, outreach, and  
 25 research areas.
- 26 b. With the increased return-to-office mandates, doctors are facing significant privacy  
 27 issues leading to consultations occurring in shared conference rooms, sometimes with  
 28 multiple people present.

- c. There have been reductions in mental health provider availability.
- d. The VA has reduced or removed gender-affirming care and eliminated certain veteran-specific programs.
- e. A local community member shared their experience of calling to make an appointment with their primary care provider, only to find they were reassigned to a new provider who is only available in the office one day a week for less than a full day.
- f. Veterans shared calling offices in neighboring counties, such as Snohomish, and reported only one answering.
- g. Reports of hospital employee terminations have raised concerns among veterans who feel that civilian healthcare organizations may not be fully equipped to handle their unique needs.

43. A large-scale RIF at the VA would also harm King County's innovative housing and support efforts for veterans, delay services for those in need, and undermine collaboration critical to program success. It would result in King County experiencing, among other things:

- a. Significant disruption to the Collaborative Case Management ("CCM") program, which blends HUD-VASH rental assistance vouchers with local housing navigation and support services and relies on close collaboration with federal VA employees.
- b. Ongoing limitations on case conferencing and initial triage coordination for veterans seeking to enter CCM, following a federal directive prohibiting communication between VA staff and non-federal organizations.
- c. A substantial reduction in King County's ability to serve veterans experiencing homelessness or housing instability, weakening a nationally recognized, award-winning program that had been advancing veteran support services.

#### **Harms Related to Downsizing of U.S. Small Business Administration**

44. A large-scale RIF at the U.S. Small Business Association ("SBA") would weaken King County's ability to support community recovery after major disasters by slowing critical financial assistance. It would result in King County experiencing, among other things:

- a. Potential delays in damage assessments, establishment of Disaster Loan Outreach



Centers, and servicing of disaster loans, which are currently fully managed by SBA employees.

- b. Financial harm to residents and businesses that depend on timely access to disaster loans, such as the \$13.2 million already offered and \$6.7 million disbursed following the November 2024 windstorm event.

45. Due to the integration between federal, state, and local governments, there are numerous other areas where large-scale RIFs of the federal workforce will impede King County's mission critical operations. Because the actions of the Trump administration are unprecedented, the full extent of adverse consequences that result from a substantially depleted federal workforce will only fully become apparent over time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 29 April 2025 at Seattle, Washington.



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